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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

S U P E R S E D I N G  
C O M P L A I N T

- against -

(21 U.S.C. § 841(a)(1))

TARA TULLY,

12-MJ-384 (ARL)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT C. LYNCH, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about October 19, 2011, within the Eastern District of New York and elsewhere, the defendant TARA TULLY, together with others, did knowingly and intentionally possess with intent to distribute and distribute a controlled substance, which offense involved a substance containing oxycodone, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I have been a Task Force Officer with the DEA for approximately three years and have been a New York State Trooper

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<sup>1/</sup> Because the purpose of this affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

for eighteen years. My information in this case comes from interviews, conversations with witnesses and other law enforcement officers, and my own participation in this investigation.

2. The DEA Task Force to which I am assigned is currently investigating the illegal distribution of pills and tablets containing oxycodone, a Schedule II controlled substance. "Oxycodone" is the generic name for an opioid analgesic medication synthesized from opium-derived thebaine. "Roxicodone" is a generic oxycodone product designed to have an immediate release effect for rapid pain relief. Oxycodone has a serious potential for abuse. Drug abusers crush the protective coating on the pill and, snort, ingest or inject it, thereby obtaining all of the drugs potency at one time. Oxycodone used in this fashion produces a heroin-like euphoria. Oxycodone is a highly addictive drug.

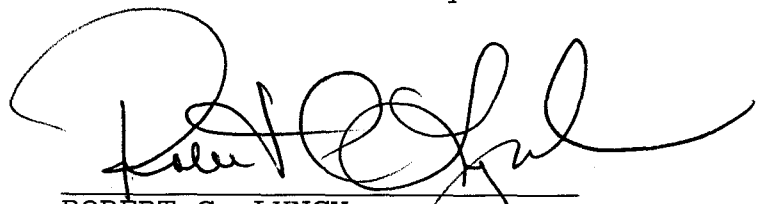
3. In June 2011, an individual hereinafter referred to the cooperating witness ("CW") was arrested in Binghamton, New York in possession of a forged prescription for Roxicodone. Law Enforcement contacted the physician named on the prescription and the physician confirmed that the prescription was forged. The CW later agreed to speak with Law Enforcement agents. The CW advised that JOHN DOE ("JD") hired CW to pass forged oxycodone prescriptions in exchange for cash and/or pills and that JD thereafter distributed the pills. CW advised that, at an apartment in Queens, New York, JD was in possession of stolen prescription paper and computer software to print counterfeit prescriptions. The CW stated that in early 2011, at the apartment, JD and the

defendant TARA TULLY printed out counterfeit prescriptions, paid individuals to pass the prescriptions at pharmacies and distributed the pills as far away from New York City as possible. The CW stated that JD collected over 1,000 oxycodone pills a day from various sources using the counterfeit prescriptions which pills JD thereafter sold to other drug dealers. The CW further stated that JD ran this operation with the defendant TARA TULLY. The CW described defendant TULLY as recruiting individuals to pass the forged prescriptions at various pharmacies and passing forged prescriptions herself.

4. Bureau of Narcotics Enforcement records reveal that the defendant TARA TULLY passed a prescription on October 19, 2011 at a pharmacy in Queens, New York. I have confirmed that this prescription is forged.

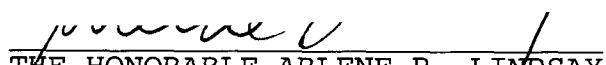
5. I believe the CW to be reliable as I have been able to independently corroborate his/her information.

WHEREFORE, your deponent respectfully requests that the a warrant be issued so that the defendant TARA TULLY may be dealt with according to law.



ROBERT C. LYNCH  
Task Force Officer - DEA

Sworn to before me this  
24th day of April, 2013



THE HONORABLE ARLENE R. LINDSAY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK